

1 ANDREW C. GREEN, ESQ.
2 Nevada Bar No. 9399
3 RIKKI J. HEVRIN, ESQ.
4 Nevada Bar No. 13738
5 KOELLER NEBEKER CARLSON & HALUCK, LLP
6 400 S. 4th Street, Suite 600
7 Las Vegas, NV 89101
Phone: (702) 853-5500
Fax: (702) 853-5599
Andrew.green@knchlaw.com
Rikki.hevrin@knchlaw.com
Attorneys for Defendant,
SAFECO INSURANCE COMPANY
OF ILLINOIS

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

11 KEITH CAVANAUGH, individually;) CASE NO.: 2:18-CV-00379-JCM-NJK
12) Plaintiff,)
13 vs.) STIPULATION AND ORDER FOR
14 SAFECO INSURANCE COMPANY OF) NINETY (90) DAY EXTENSION OF
ILLINOIS; DOES I – X; and ROE) TIME FOR PLAINTIFF'S RESPONSE
CORPORATIONS I – X, inclusive,) TO PENDING MOTION FOR
15) SUMMARY JUDGMENT (ECF #22)
Defendant.) [FIRST REQUEST]

17 **COMES NOW**, Defendant, SAFECO INSURANCE COMPANY OF ILLINOIS
18 (hereinafter referred to as “Defendant”), by and through its attorneys, the law firm of
19 KOELLER, NEBEKER, CARLSON & HALUCK, LLP, and Plaintiff, KEITH
20 CAVANAUGH (hereinafter “Plaintiff”), by and through his counsel of record, Justin G.
21 Randall, Esq. of GLEN LERNER INJURY ATTORNEYS, and hereby submit this joint
22 stipulation and proposed order to extend the deadline for Plaintiff’s response to the pending
23 motion for summary judgment by Defendant (ECF #22.) The parties’ request the time for
24 Plaintiff to respond to the pending motion for summary judgment be extended by ninety (90)
25 days, so that any response by Plaintiff would be due to the Court no later than January 23,
26 2019. The extension of time requested by the parties herein is due to the parties’ new
27 agreement to resolve the subject dispute by binding arbitration, and the extension requested
28 herein is intended to permit the parties to finalize their agreement in that regard and resolve

1 the matter by an arbitration hearing prior to expiration of the extended deadline for Plaintiff to
2 respond to the motion for summary judgment. The intent of the parties' agreement is to permit
3 the matter be dismissed with prejudice to after conclusion of the arbitration agreement, and to
4 relieve the Court of the necessity of further burdens for this matter.

5 RESPECTFULLY SUBMITTED this 23rd day of October, 2018.

6 DATED this 23rd day of October, 2018.

DATED this 23rd day of October, 2018.

7 KOELLER NEBEKER CARLSON
& HALUCK, LLP

GLEN LERNER INJURY ATTORNEYS

8
9 By: /s/Andrew C. Green
ANDREW C. GREEN, ESQ.
Nevada Bar No. 9399
400 S. 4th Street, Suite 600
Las Vegas, NV 89101
Attorneys for Defendant,
SAFECO INSURANCE COMPANY OF
ILLINOIS

By: /s/Justin G. Randall
JUSTIN G. RANDALL, ESQ.
Nevada Bar No. 12476
4795 South Durango Drive
Las Vegas, NV 89147
Attorneys for Plaintiff,
KEITH CAVANAUGH

13
14 **ORDER**

15 Consistent with the foregoing stipulation, the parties' joint request to extend the time
16 for Plaintiff to respond to the pending motion for summary judgment (ECF #22) by ninety
17 (90) days IS GRANTED. Any response by Plaintiff will be due to the Court no later than
18 January 23, 2019.

19 **IT IS SO ORDERED.**

20 DATED this 25th day of October, 2018.

21
22 
U.S. DISTRICT COURT JUDGE
23 HONORABLE JAMES C. MAHAN